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Southern District of Texas
FILED

AO91 (Rev. 12/03) Criminal Complaint

AUSA

UNITED STATES DISTRICT COURT

APR 27 2018

David J. Bradley, Clerk of Court

Southern District Of Texas Brownsville Division

UNITED STATES OF AMERICA**CRIMINAL COMPLAINT**

vs.

Case Number: B-18-

MJ-405

1. Luis Armando AVONCE-Hernandez
A#200 821 405 MEXICO
2. Leticia GONZALEZ-Adame
A#216 445 817 MEXICO

I, the undersigned complainant state that the following is true and correct to the best of my

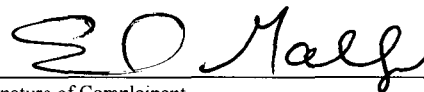
knowledge and belief. On or about March 01, 2018 in Cameron County, inthe Southern District Of Texas defendant(s)

knowingly, willfully, and in reckless disregard of the fact that forty two (42) undocumented alien(s) had come to, entered, and remained in the United States in violation of law; did conceal, harbor and shield from detection said alien(s),

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii)I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:

On March 1, 2018 at approximately 6:00 p.m., Border Patrol Agents conducted a consensual search at 2934 Andorra Street in Brownsville, Texas. The result of the search resulted in the apprehension of 42 illegal aliens and one principal. Once at the Brownsville Station, Agents initiated a smuggling investigation, discovering through self-admission and through testimony provided by four individual's subjects, serving as Material Witnesses, that Emerson Herrera-Gonzalez was the caretaker of the group.

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Signature of Complainant

Gallegos, Samuel Border Patrol Agent

Printed Name of Complainant

Sworn to before me and signed in my presence,

April 27, 2018

Date

at

Brownsville, Texas

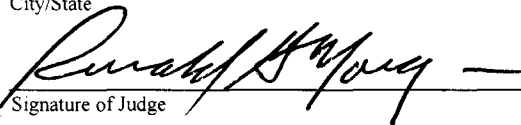
City/State

Ronald G. Morgan

Name of Judge

U.S. Magistrate Judge

Title of Judge



Signature of Judge

APR 27 2018

AFFIDAVIT

In support of Criminal Complaint

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.


Luis Armando AVONCE-Hernandez
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During the course of the smuggling investigation, Agents discovered additional evidence that linked additional co-conspirators in the smuggling activities. It was discovered that Eduardo Manuel De Jesus Buentello rented the house at 2934 Andorra Street in Brownsville, Texas, transported illegal aliens to and from the location, and for some time took the roll as the caretaker of the stash house. Subject Hector Gomez-Pompa, was identified as the smuggling cell facilitator in charge of local operation. Both subjects were indicted under Grand Jury and warrants for their arrest were issued.

Further investigation and testimony of defendants has linked two additional co-conspirators to the smuggling event that occurred on March 1, 2018, Luis Armando Avonce-Hernandez and Leticia Gonzalez-Adame. Avonce-Hernandez has been identified as the head of the alien smuggling organization operating out of Houston, Texas along with Gonzalez-Adame. It was discovered Avonce-Hernandez and Gonzalez-Adame had constant contact with the caretakers of the aforementioned smuggling event. On numerous occasions Avonce-Hernandez and Gonzalez-Adame would provide the caretakers with instructions/orders of the smuggling arrangements. In total, Avonce-Hernandez and Gonzalez-Adame were responsible for the smuggling of approximately 250 illegal aliens that were harbored at 2934 Andorra Street in Brownsville, Texas.

SUBSCRIBED and SWORN to before me this 27th day of April, 2018.


Signature of Judicial Officer


Signature of Complaintant

Border Patrol Agent